

(lda)

HOWARD TRAPP
HOWARD TRAPP INCORPORATED
200 Saylor Building
139 Chalan Santo Papa
Hagåtña, Guam 96910
Telephone (671) 477-7000

FILED
DISTRICT COURT OF GUAM
DEC 20 2005
MARY L.M. MORAN
CLERK OF COURT

Attorney for defendant

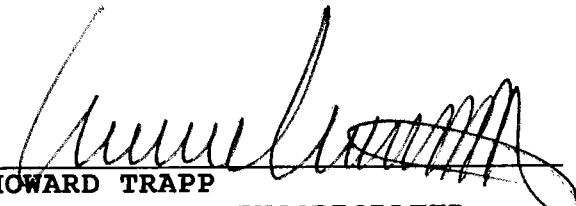
DISTRICT COURT OF GUAM

UNITED STATES OF AMERICA,	(Criminal Case No. 04-00008
)	
Plaintiff,	(REQUEST FOR PRODUCTION
)	OF EXCULPATORY AND
vs.	(IMPEACHMENT EVIDENCE
)	(<u>BRADY V. MARYLAND</u> , 373
KUANG-HUA CHEN,	(U.S. 83 (1963).)
)	
Defendant.	(

Defendant requests that the government produce all evidence favorable to defendant and material either to guilt or to punishment including, but not limited to, all information about its witnesses that could cast doubt upon their credibility, and in connection with the latter, that the government undertake, in accordance with the policy set forth in United States v. Jennings, 960 F.2d 1488, 1492 n.3 (9th Cir. 1992), an examination of the personnel files of its law enforcement officer witnesses for such material.

Dated, Hagåtña, Guam,

December 20, 2005.


HOWARD TRAPP
HOWARD TRAPP INCORPORATED
Attorney for defendant

ORIGINAL

DECLARATION OF SERVICE

I, Leilani D. Ada, declare that I am an administrative assistant employed in the office of Howard Trapp, Esq., the attorney for defendant herein, and that I served the document to which this declaration is annexed on Marivic P. David, Esq., Assistant United States Attorney, the attorney for plaintiff herein, by leaving a copy thereof at Office of the United States Attorney for Guam and the Northern Mariana Islands, Suite 500, Sirena Plaza, 108 Hernan Cortez Avenue, Hagåtña, Guam, Ms. David's last known address, with a person in charge thereof, on December 20, 2005.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 20, 2005, at Hagåtña, Guam.


LEILANI D. ADA